



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

March 11, 1997

Mr. Philip S. Otis
U.S. Department of the Navy/Northern Division - NAVFAC
10 Industrial Highway
Code 1811/PO - Mail Stop 82
Lester, PA 19113-2090

Re: Draft Closeout Report for IR Program Site 10 at the former Naval Construction Battalion
Center Davisville, Rhode Island, Dated 20 January 1997

Dear Mr. Otis:

Pursuant to § 12.5 of the NCBC Federal Facility Agreement (FFA), the Environmental Protection Agency's (EPA) has reviewed the above referenced document. In this document, the Navy has indicated that the cleanup objective for debris removal has been achieved at this site.

This letter will confirm that EPA finds that the document, if modified to include all of the changes set forth in the enclosed comments, will comply with the requirements of the EPA guidance document Superfund Removal Procedures; Removal Response Reporting: POLREPs and OSC Reports.

EPA requests that the Navy respond to the attached comments IAW § 12.5 of the FFA, with either a written response to comments or a revised final report. If you have any questions with regard to this letter, please contact me at (617) 573-5736.

Sincerely,

A handwritten signature in cursive script, appearing to read "Christine Williams".

Christine A.P. Williams, RPM
Federal Facilities Superfund Section

Enclosure

cc: Christi Davis, NORTHDIV
Richard Gottlieb, RIDEM
Walter Davis, CSO
Tim Prior, USF&WL
George Horvat, Dynamac
Jim Shultz, EA



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**Technical Review of the Close-Out Report
for the Removal Action at Site 10
Naval Construction Battalion Center, Davisville, Rhode Island**

GENERAL COMMENT:

1. One major omission was noted within the report. There is no discussion, supporting documentation, or analytical data which supports waste characterization. The report needs to clearly present documentation utilized to properly characterize the waste removed. Specific comments to this report are noted below.

SPECIFIC COMMENTS:

2. **Section 3.0 Removal Action Activities, 4th paragraph.** The report indicates that a wetland survey was performed "at, or in close proximity to the three disposal areas". Clarification should be provided as to what constitutes "close proximity".

3. **Section 4.0 Transportation and Disposal.** This section identifies the waste that was removed from the site, its quantity, and final disposition of the waste. There is no mention whether a waste characterization analysis was performed on the waste removed. Based on the limited descriptions of the waste material found, no inference can be made whether or not the waste material contained hazardous constituents. Further description of the waste should be provided. Specifically, was the wood debris painted, and if so, was lead analysis performed on the wood debris? Did the glassware constitute what is typically found in laboratories? If no waste characterization was performed on the waste prior to disposal, justification for not analyzing the waste should be provided, possibly citing analytical data from previous site investigations.

4. **Appendix B: Photographs.** The appendix includes a series of photographs of the site location "after" the completion of the removal. For better documentation and clarification as to the scope of activities, it may be prudent to also include photographs, if available, taken before the removal activities were undertaken for comparison.

5. **Appendix C: Wetland Survey at Camp Fogerty Disposal Area, Site 10, 2nd paragraph.** The second paragraph describes the site layout. In contradiction to the text within the Close-Out Report, this paragraph states there are four disposal area referred to as areas A, B, C, and D. The Close-Out text refers to only three disposal areas designated areas, 1, 2, and 3. These reports should be consistent and the areas referred to with similar nomenclature.

6. Additionally, the Results and Discussions section within this appendix describes the results of augering which was apparently performed within the boundaries of the disposal areas. In three of the four locations, augers encountered fill at or immediately below the ground surface which restricted auger penetration. These areas were obviously disturbed from past construction or disposal activities. It is not clear why no effort was made to auger outside of the disposal areas to characterize the native

soil types adjacent to these disposal areas. It is recommended that further discussion be provided to explain the rational for limiting the subsurface characterization activities to the disposal areas.

EDITORIAL COMMENTS.

7. Appendix C. Results and Discussion Section. 3rd paragraph. The word "of" should be inserted between the words "comprised" and "large".

8. Appendix C. Last Paragraph 2nd to last Sentence: The word "to" should be inserted between the words "Due" and "the".